



## FLORIDA DEPARTMENT OF TRANSPORTATION

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September 23, 2004

# MEMORANDUM

**TO:** Federal Communications Commission

**FROM:** Charles Holzschuher, Friction and NDT Programs Administrator

**COPIES:** John A. Reed, Office of Engineering and Technology

**SUBJECT:** ET Docket No. 04-374

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In response to the docket item (No. 04-374), the Pavement Evaluation Section of the Florida Department of Transportation has been using an air-coupled 1.0 GHz antenna for over 9 years. This equipment has been imperative to the Pavement Evaluation process. The radar system is primarily used to collect thickness estimations for roadway surfaces, provides forensic investigations for roadway failures, and reduces the impact on motorists due to highway speed testing. The information this system provides is paramount to help roadway design, safety, and provide research input to improve state processes.

However, the Florida Department of Transportation's existing (grandfathered) ground penetrating radar system has been extended past its service life and is in need of repair. Unfortunately, the antenna replacement parts are no longer being manufactured and have become increasingly difficult to be refurbished. This has been a huge concern with other state agencies. New systems are available, but cannot be purchased at this time.

Florida Department of Transportation has never had any negative feedback/reactions from the use of the grandfathered air coupled antenna while testing in Florida. Approval of the waiver would be encouraged to facilitate pavement analysis processes and ensure replacements for the current aging generation of non-contact GPR devices.

Please contact me if any questions/issues arise.